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September 25, 2006

**VIA ELECTRONIC FILING
AND HAND DELIVERY**

The Honorable Joseph J. Farnan, Jr.
United States District Court
For the District of Delaware
844 North King Street
Wilmington, Delaware 19801

Re: Secureworks, Inc. v. Secure Networx Corp., C.A. 05-538-JJF

Dear Judge Farnan:

We represent Plaintiff, Secureworks, Inc., in the above-referenced action. We have received Mr. Ezer's letter dated September 22, 2006 in response to Plaintiff's Motion for Contempt, Sanctions, and to Enforce the Judgment on Consent. Plaintiff once again finds itself spending substantial time and money dealing with a corporate defendant which has not retained a lawyer in this case despite previous notice from the Court. See D.I.17. While the defendant acts in disregard of the Consent Judgment and Settlement Agreement in this case, our client continues to incur legal fees. The defendant needs to retain counsel as required in this Court.

Defendant was notified pursuant to Local Rule 7.1.1 and was asked to withdraw its request to reinstate a cancelled trademark registration at the U.S. Patent and Trademark Office. My co-counsel, Keith Sharkin of King & Spalding, sent a "reply" e-mail to the e-mail sent by Mr. Ezer at adamezer@hotmail.com. King & Spalding's IT Department has confirmed that the e-mail was sent. When no response was received, the motion was filed the next day. Moreover, Rule 7.1.1 requires a reasonable effort to reach agreement with the "opposing attorneys". Defendant has not retained an attorney. Plaintiff had to move quickly given defendant's willful breach of a court order and the settlement agreement. The need for the present motion was due solely to defendant's actions. Defendant needs to retain a lawyer to respond properly to the motion. Plaintiff is also seeking its attorneys fees in connection with the motion as provided in the settlement agreement. Defendant must know the consequences of its actions.

We are available at the Court's convenience if Your Honor has any questions.

Respectfully,

/s/ Richard L. Horwitz

Richard L. Horwitz

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cc: Clerk of the Court (via Hand Delivery)
Mr. Adam J. Ezer (via International Air Mail)
Keith E. Sharkin, Esquire (via electronic mail)